

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SOARING HELMET CORPORATION, a  
Washington corporation,,

Plaintiff,

v.

NANAL, INC., d/b/a/ LEATHERUP.COM, a  
Nevada corporation, and GOOGLE, INC., a  
Delaware corporation.,

Defendant.

No. 2:09-cv-00789-JLR

**DECLARATION OF JULIE BRAZITIS**

**DECLARATION OF GOOGLE INC. REPRESENTATIVE JULIE BRAZITIS**

I, Julie Brazitis, hereby declare and state as follows:

1. I am an AdWords Strategist for Google Inc. ("Google"). I have been employed by Google since January 2008. I make this declaration in support of Google's Response to Plaintiff's Proposed Order for Default Judgment against Nanal, Inc. (filed October 1, 2009) in the matter captioned *Soaring Helmet Corporation v. Nanal, Inc., d/b/a/ Leatherup.com and Google Inc.*, Civil Action No. 2:09-cv-00789-JLR (W.D. Wash.). I am over the age of eighteen.

I know the facts stated herein of my own personal knowledge and my review of business records of the type I typically consult. If called to testify as a witness, I could and would do so competently and under oath.

2. Google's online advertising service that allows advertisers to create advertisements and to display them online in a targeted manner is called "AdWords." Plaintiff Nanal, Inc., d/b/a/ Leatherup.com ("Leatherup.com") is an AdWords advertiser.

3. I have reviewed the account history of Leatherup.com. On August 24, 2009, Leatherup.com changed its AdWords account terms to halt use of any keywords that included the word "Vega." Further, Leatherup.com made "Vega" and "Vega helmets" as negative keywords. As a result, Leatherup.com's advertisements do not appear when "Vega" is entered as a search query using Google.com.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 2nd day of October, 2009, at Santa Clara County, California.

  
Julie Brazitis